



April 16, 2021

VIA ECF

The Honorable Louis L. Stanton
U.S. District Judge
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street, Courtroom 21 C
New York, NY 10007

Re: In re Grupo Televisa Sec. Litig., No. 1:18-cv-01979-LLS (S.D.N.Y.)

Dear Judge Stanton:

Earlier today, my Firm was retained as counsel for Class Representative Palm Tran, Inc. Amalgamated Transit Union Local 1577 Pension Plan ("Palm Tran") in this matter. It is my understanding that, on April 12, 2021, Defendants filed under seal a letter-motion for a pre-motion conference seeking leave to file a motion for disqualification. Although I have not yet seen the sealed filing, it is my understanding that, the filing makes assertions concerning the Sugarman & Susskind firm which has served as liaison counsel for Palm Tran in this matter. I respectfully request five (5) days to review the papers and file a response to Defendants' letter-motion for a pre-motion conference.

I have conferred with liaison counsel and with Class Counsel Robbins Geller and intend to coordinate a response with them. If the court approves, we will respond to Defendants' pre-motion conference letter on or before this coming Wednesday, April 21, 2021, or such other time as the Court directs.

I look forward to the opportunity to appear before Your Honor again.

Respectfully submitted,

A handwritten signature in blue ink that reads "David Boies". The signature is written in a cursive, flowing style.

David Boies